

EXHIBIT 2

1 **Q.** Are there some -- it sounded like you were describing
2 complaints that came in from the public. Is that correct?

3 **A.** Yes.

4 **Q.** Are there other complaints or allegations of things that
5 need to be investigated that don't come in from the public?

6 **A.** There could be. I mean, if somebody comes in from our
7 election supervisors throughout the state of Georgia, it could
8 be assigned, yes, sir.

9 **Q.** Okay. And do these complaints get numbers in your
10 tracking system?

11 **A.** Yes, sir. Typically they start with the designation SEB
12 for State Election Board, and then the first four digits are
13 the year. So for this year it would be 2024. And then the
14 last series of numbers as well.

15 **Q.** Okay. And does -- would every investigative report
16 generated result in some kind of written report as to the
17 designation of the -- as to the disposition of the matter?

18 **A.** Yes, sir. If it is an assigned case to an investigator,
19 it would have a report. Yes, sir.

20 **Q.** Okay. Let's shift gears a little bit and ask you some
21 general questions on Coffee County, which is one of the
22 subjects of this litigation.

23 I'm going to come back through more of your experience,
24 but I want to get an overview first.

25 So that we're clear on our terminology, I'm going to

1 define the phrase January 2021 Coffee County breaches, and what
2 I'm referring to are three separate things. The first was what
3 we would call a breach led by the SullivanStrickler team on
4 January 7, 2021. The next was by Doug Logan and Mr. Lenberg on
5 January 18 and 19, 2021. And the third is Mr. Lenberg,
6 January 25th to January 29, 2021.

7 So the way we're characterizing those is three separate
8 but they are all a part of what I'm going to call the
9 January 21 Coffee County breaches.

10 Are you with me?

11 **A.** Yes, sir.

12 **Q.** When did you first learn anything about the January 2021
13 Coffee County breaches?

14 **A.** It was assigned, I believe -- a case was opened with the
15 Investigations Division for the Secretary of State in 2022. I
16 believe it was April of 2022.

17 **Q.** And had you not heard about anything about any of these
18 breaches before that case was assigned in April of 2022?

19 **A.** Not in our office, no, sir.

20 **Q.** Outside of the office?

21 **A.** I may have heard something in the media. I'm not
22 100 percent sure on that.

23 **Q.** Do you recall the media that you saw it in or the
24 newspaper?

25 **A.** It would have probably been an internet news source. I

1 don't really watch a lot of media.

2 **Q.** And would that have been shortly before it was assigned to
3 you as a case in April of '22?

4 **A.** Around about, yes, sir.

5 **Q.** Okay. Do you recall the case number that the Coffee
6 County breaches was assigned?

7 **A.** Originally, it was assigned to a case that had already
8 been closed. It was SEB 2020-250. That case was originally
9 assigned to me in 2020, but it had nothing to do with those
10 allegations. And later on it was -- a new case number was
11 created as 2022-207, I believe.

12 **Q.** And was a report of investigation ever issued for
13 2020-250, the first one?

14 **A.** The report of investigation was, but it was totally
15 separate allegations. It was something that happened in 2020.

16 **Q.** Was there ever a report associated with Case Number 207?

17 **A.** It is still an open case. It has actually been handed
18 over to the GBI.

19 **Q.** So no report from the Secretary of State on the case
20 involving the January 2021 Coffee County breaches; correct?

21 **A.** No, sir. Not at this time.

22 **Q.** When you -- in April of 2020 -- I'm sorry. In April of
23 2022, when you first learned of the Coffee County breaches, who
24 assigned the matter to you?

25 **A.** That would have been my direct supervisor, Glenn Archie.

1 **Q.** And did Mr. Archie describe to you what you were supposed
2 to do?

3 **A.** At that particular time, we were told to hold off.

4 **Q.** Did he tell you why you were supposed to hold off?

5 **A.** I believe they were doing an analyst -- or they were
6 analyzing the Coffee County server, I believe.

7 **Q.** And what was the relation between them analyzing the
8 server and you doing your normal investigative work? Why did
9 that hold you up?

10 **A.** That particular time we didn't have a lot of information
11 that was given to us.

12 **Q.** You didn't have enough -- you didn't have enough
13 information to do much of an investigation in April of 22 --
14 2022?

15 **A.** I was told to hold off moving forward with an
16 investigation.

17 **Q.** And who told you to hold off?

18 **A.** That came from our supervisors. It would have been Glenn
19 Archie and above.

20 **Q.** And when you say above, what do you mean?

21 **A.** It was someone within the election division. I got the
22 information from Glenn Archie. And he had spoken with Sara
23 Koth.

24 **Q.** And who had she spoken to, if you know?

25 **A.** I do not.

1 THE COURT: Sara Calg is C-A-L-G? How do you spell
2 her name? How do you spell Ms. Koth's last name?

3 THE WITNESS: Koth, K-O-T-H.

4 THE COURT: K-O-T-H.

5 BY MR. BROWN:

6 **Q.** Mr. Blanchard, I'm going to hand to you a copy of Curling
7 Plaintiffs' Exhibit 40.

8 MR. BROWN: Your Honor, this may already be admitted
9 into evidence. But I'm going to go ahead and start asking him
10 questions on it just in case.

11 BY MR. BROWN:

12 **Q.** What is Exhibit 40, Mr. Blanchard?

13 **A.** It is a report of investigation of SEB 2020-250.

14 **Q.** And this was written by you; is that correct?

15 **A.** That is correct.

16 **Q.** And I believe you testified earlier that the matters that
17 are in this particular bucket of complaints does not include
18 the Coffee County January 2021 breaches; correct?

19 **A.** No, sir.

20 **Q.** And it is your understanding that the Coffee County
21 breaches were originally put into this or put under this matter
22 number but then carved out; is that right?

23 **A.** This case was originally -- I'm sorry. It was originally
24 submitted for the election board, I believe, in 2021. And it
25 was then later reopened and that allegation was -- was put